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**MSG**

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

**HELENA C. BURKENTIN  
And DUANE B. BURKENTINE,  
Wife and Husband  
20 Dunbar Road  
Newark, DE 19711,**

**Plaintiffs,**

**v.**

**PHILADELPHIA  
INTERNATIONAL AIRPORT  
8800 Essington Avenue  
Philadelphia, PA 19153**

**AND**

**THE CITY OF PHILADELPHIA  
1515 Arch Street, 14<sup>th</sup> Floor  
Philadelphia, PA 19102,**

**Defendants**

**CIVIL ACTION**

**NO. 14 4737**

**COMPLAINT**

Plaintiffs, Helena C. Burkentine and Duane B. Burkentine, complaining of the defendants Philadelphia International Airport and The City of Philadelphia by and through their attorney The Law Offices of J. Patrick Holahan, II, & Associates, LLC respectfully allege as follows:

**JURISDICTION OF VENUE**

Jurisdiction of this action is conferred upon the Court by 28 U.S.C. §1332, Diversity of Citizenship, in that the Plaintiff is a citizen of the state of Delaware and Defendants are citizens of the Commonwealth of Pennsylvania and the amount in controversy is in excess of \$75,000.00. Venue is proper in this district pursuant to 28 U.S.C. §1391(a) in that the cause of action arose in this district.

**PARTIES**

1. Plaintiffs, Helena C. Burkentine and Duane B. Burkentine are adult individuals, citizens of the state of Delaware, with a place of residence located at 20 Dunbar Road, Newark, New Castle County, DE.

2. Defendant, Philadelphia International Airport, is a major airport duly organized and existing under and by virtue of the laws of the Commonwealth of Pennsylvania, with its principal office located at 8800 Essington Avenue, Philadelphia, Pennsylvania.

3. Defendant, the City of Philadelphia, is a municipal corporation duly organized and existing under and by virtue of the laws of the Commonwealth of Pennsylvania, with its principal office located at Law Department, 1515 Arch Street, 14<sup>th</sup> Floor, Philadelphia, Pennsylvania.

4. On or about August 27, 2012, and at all time herein, the defendants, Philadelphia International Airport and the City of Philadelphia, each of them owned and/or leased, and by their agents, servants, workmen and/employees, maintained, supervised, inspected and controlled the premises known as Philadelphia International Airport and all common walkway area, floors, hallways leading to and from the airport located at the aforesaid address, and they were under the primary inspection, supervision, possession, repair, maintenance and control of the defendants.

5. On or about August 27, 2012, and at all times herein, the defendants, and each of them, owned and/or leased, and by their agents, servants, workmen and/or employees, maintained, supervised, inspected and controlled the premises known as the Philadelphia International Airport and all of the aforesaid walkway/area/floors/hallways of the premises located at the aforesaid address under the primary inspection, supervision, possession, repair, maintenance and control of the named defendants.

6. At the times and place aforesaid, plaintiff, Helena C. Burkentine, was a business invitee lawfully upon the premises of the defendants.

7. At the time and place aforesaid, the defendants, and each of them, by their agents, servants, workmen and/or employees, were under a duty to keep, inspect, possess, supervise, maintain and repair said common walkway/area/floor/hallways at the Philadelphia International Airport, in a safe condition for those lawfully upon the premises.

8. Notwithstanding this duty, the defendants, and each of them, by and through their agents, servants, workmen and/or employees, did on the date aforesaid, and for some time prior thereto, carelessly, recklessly and negligently permit and allow the common walkway/area/floor/hallways of the said premises to be, become and remain in a highly dangerous, defective and unsafe condition located on the said premises.

9. On the aforesaid date and time, while plaintiff, Helena C. Burkentine, was a lawful pedestrian on the common walkway/area/floor/hallway of the aforesaid premises of the defendants, she was caused to slip, trip, stumble and fall by reason of coming into contact with water on the floor in the hallway/walkway area of the international terminal area as a result of water leaking from the roof of the airport and allowed to puddle on the walkway which created a dangerous, defective and unsafe condition, as a result of which, plaintiff sustained permanent loss of bodily function and serious and permanent personal injuries hereinafter more specifically set forth.

10. Plaintiff avers that defendants, and each of them, by their agents, servants, workmen and/or employees, had or should have had notice of the existence of the said dangerous, defective and unsafe condition upon the premises above-mentioned prior to the happening of the said accident, and allowed this dangerous, defective and unsafe condition to exist for an unreasonable period of time.

11. At the time and place aforesaid, the carelessness, recklessness and negligence of defendants, and each of them, consisted of the following:

(a) Failing to properly maintain and inspect the common walkway/area/floor/hallway of the aforesaid premises;

(b) Failing to properly supervise and maintain the common walkway/area/floor/hallway of the aforesaid premises;

(c) Failing to give proper and sufficient warning and notice to the plaintiff of the highly dangerous, defective and unsafe condition located on the aforesaid premises;

(d) Disregarding the rights and safety of the plaintiff and other persons who are business invitees lawfully on the premises of the defendants;

(e) Allowing the floor of the said premises to remain in a dangerous, defective and unsafe condition;

(f) Failing to use reasonable prudence and care to keep the common walkway/area/floor/hallway of the said premises in a safe condition;

(g) Failing to instruct their employees as to the proper care, maintenance and control of the said common walkway/area/floor/hallway of the said premises;

(h) Failing to give proper instruction to the maintenance crew on the proper placement of the CAUTION/SLIPPERY WHEN WET SIGNS;

(i) Failing to place CAUTION/SLIPPERY WHEN WET SIGNS in an effort to warn patrons of the hazards of a slippery floor;

(j) Failing to give proper instruction to the maintenance crew for periodic inspection to check on the CAUTION/SLIPPERY WHEN WET SIN to ensure they have not shifted with foot traffic;

- (k) Failing to supervise, control and enforce the tenants and the subtenants maintenance of said premises;
- (l) Other acts of negligence discovered during the course and scope of discovery; and
- (m) Failing to instruct their employees as to the proper care, maintenance and control of said common walkway/area/floor/bathroom of said premises.

COUNT I  
PLAINTIFF, HELENA BURKENTINE  
V.  
ALL DEFENDANTS

12. Plaintiff, Helena C. Burkentine, incorporates herein by reference the averments contained in paragraphs 1 through 11 inclusive, as fully as though the same were herein set forth at length.

13. Solely as a result of the aforesaid negligence, carelessness and recklessness of the defendants, and each of them, as aforesaid, plaintiff, Helena C. Burkentine, sustained severe and permanent internal and external injuries in and about the head, body, and limbs. She has in the past required and will in the future continue to require medicines, medical care and attention; she has in the past suffered and will in the future continue to suffer agonizing aches, pains and mental anguish; she has in the past and will in the future continue to be disabled from performing her usual duties and avocations.

14. As a result of the accident aforesaid, plaintiff, Helena C. Burkentine, has and will hereinafter incur additional financial expenses or losses, which will exceed amounts which plaintiff may otherwise be entitled to recover under the Pennsylvania Financial Responsibility Act.

15. Plaintiff, Helena C. Burkentine, avers that as a direct result of the carelessness, recklessness and negligence of the defendants, Philadelphia International Airport and the City of

Philadelphia, as aforesaid, she has sustained injuries, as a result of which, she has been required and obliged to receive and undergo medical attention and care, and will incur various medical expenses, to which plaintiff is entitled to recover.

16. Further, by reason of the aforesaid, plaintiff, Helena C. Burkentine, has been obliged to expend various sums of money for medicine and medical attention in and about endeavoring to treatment and cure herself of said injuries, and will be obliged to expend additional sums of money for the same purposes in the future, all to her great financial damage and loss.

17. Further, by reason of the aforesaid, plaintiff, Helena C. Burkentine, will in the future, be obligated to expend various sums of money for medicine and medical attention in and about endeavoring to treat and cure herself said injuries sustained as the result of the incident, all to her great financial damage and loss.

18. Plaintiff avers that the injuries and damages sustained as a result of this incident were caused solely by the negligence of the defendants, and each of them as hereinbefore set forth.

WHEREFORE, Plaintiffs, Helena C. Burkentine and Duane B. Burkentine , demands judgment against the defendants, Philadelphia International Airport and the City of Philadelphia in an amount in excess of \$75,000.00 plus interest and costs.

COUNT II  
PLAINTIFF, DUANE B. BURKENTINE  
V.  
ALL DEFENDANTS

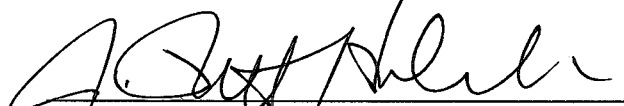
19. Plaintiff, Duane B. Burkentine, incorporates herein by reference the averments contained in paragraphs 1 through 18 inclusive, as fully as though the same were herein set forth at length.

20. As a result of the aforesaid circumstances and negligence of the defendants, Philadelphia International Airport and the City of Philadelphia, Duane B. Burkentine has been and probably will in the future be the deprived of the aid, comfort, society, and consortium of his wife, Helena C. Burkentine.

WHEREFORE plaintiff, Duane B. Burkentine demands judgments against the defendants, Philadelphia International Airport and the City of Philadelphia in an amount in excess of \$50,000.00 plus interest and costs.

Law Offices of J. Patrick Holahan, II, & Associates, LLC

By:



J. PATRICK HOLAHAN, II, ESQUIRE

928 East Baltimore Pike

PO Box 818

Kennett Square, Pennsylvania 19458-0818

610-444-9795 - phone

610-444-6435 - fax

pat@jpholahan2.com – email

Attorney ID No. 45679

**VERIFICATION**

Helena C. Burkentine, the Plaintiff in the foregoing pleading hereby states that the facts contained herein are true and correct to the best of his information, knowledge and belief and this Affidavit or Verification is made subject to penalties of 18 PA. C.S.A. §4904 relating to unsworn falsification to authorities.

  
HELENA C. BURKENTINE



The JS 44 civil cover sheet and accompanying instructions contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This cover sheet, as approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil cover sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**

Helena C. Burkentine and Duane B. Burkentine  
20 Dunbar Road  
Newark, DE 19711

(b) County of Residence of First Listed Plaintiff New Castle  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

J. Patrick Holahan, II, Esquire  
Law Offices of J. Patrick Holahan, II & Associates LLC  
928 E. Baltimore Pike  
Kennett Square, PA 19348  
610-444-9795

**DEFENDANTS**

Philadelphia International Airport  
8800 Essington Avenue  
Philadelphia, PA 19153

City of Philadelphia  
1515 Arch Street, 14<sup>th</sup> Floor  
Philadelphia, PA 19102

County of Residence of First Listed Defendant Delaware

(IN U.S. PLAINTIFF CASES ONLY)

NOTE:

IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

unknown

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   |                                       |                                       |   |                            |                            |
|---|---------------------------------------|---------------------------------------|---|----------------------------|----------------------------|
|   | PTF                                   | DEF                                   |   | PTF                        | DEF                        |
| Citizen of This State                   | <input type="checkbox"/> 1            | <input checked="" type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input checked="" type="checkbox"/> 2 | <input type="checkbox"/> 2            | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3            | <input type="checkbox"/> 3            | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input checked="" type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities Employment <input type="checkbox"/> 446 Amer. w/Disabilities Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

**V. ORIGIN** (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

28 USC 1391A

Brief description of cause:

Negligence, slip and fall

**VII. REQUESTED IN COMPLAINT:**

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint

JURY DEMAND: ☐ Yes ☒ No

**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

AUG 13 2014

DATE

8.13.14

SIGNATURE OF ATTORNEY OF RECORD

J. Patrick Holahan, II

S.T.

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

## UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 20 Dunbar Road, Newark, DE 19711

**14 4737**

Address of Defendant: Philadelphia International Airport: 8800 Essington Avenue, Philadelphia, PA 19153; City of Philadelphia: 1515 Arch Street, Philadelphia, PA 19102

Place of Accident, Incident or Transaction: Philadelphia International Airport

(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?

(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a))

Yes ☐ No ☒

Does this case involve multidistrict litigation possibilities?

Yes ☐ No ☒

RELATED CASE, IF ANY:

Case Number: N/A

Judge

Date Terminated:

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?  
Yes ☐ No ☒

CIVIL: (Place X in ONE CATEGORY ONLY)

A. Federal Question Cases:

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☐ Civil Rights
8. ☐ Habeas Corpus
9. ☐ Securities Act(s) Cases
10. ☐ Social Security Review Cases
11. ☐ All other Federal Question Cases  
(Please specify) \_\_\_\_\_

B. Diversity Jurisdiction Cases:

1. ☐ Insurance Contract and Other Contracts
2. ☐ Airplane Personal Injury
3. ☐ Assault, Defamation
4. ☐ Marine Personal Injury
5. ☐ Motor Vehicle Personal Injury
6. ☒ Other Personal Injury (Please specify): Slip and fall
7. ☐ Products Liability
8. ☐ Products Liability — Asbestos
9. ☐ All other Diversity Cases

(Please specify) \_\_\_\_\_

ARBITRATION CERTIFICATION

(Check Appropriate Category)

I, J. Patrick Holahan, II, counsel of record do hereby certify:

- ☐ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;
- ☐ Relief other than monetary damages is sought.

DATE: \_\_\_\_\_

Attorney-at-Law

45679

Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

**AUG 13 2014**

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 8.13.14

J. Patrick Holahan, II  
Attorney-at-Law

45679

Attorney I.D.#



**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**CASE MANAGEMENT TRACK DESIGNATION FORM**

HELENA BURKENTINE and DUANE B.  
BURKENTINE, Wife and Husband  
20 Dunbar Road  
Newark, DE 19711

Plaintiffs,

v.

PHILADELPHIA INTERNATIONAL AIRPORT  
8800 Essington Avenue  
Philadelphia, PA 19153  
and  
CITY OF PHILADELPHIA,  
1515 Arch Street  
Philadelphia, PA 19102

: CIVIL ACTION

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NO.

**14**

**4737**

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

**SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:**

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ( )
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ( )
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ( )
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ( )
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ( )
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (X)

Date

(610)444-9795

Telephone

J. Patrick Holahan, II

Attorney-at-law

(610)444-6435

FAX Number

Attorney for Plaintiffs

legal@jpholahan2.com

E-Mail Address

**AUG 13 2014**